

Prison Reform Trust response to the Public Accounts Committee inquiry on efficiency and resilience of the Probation Service – November 2025

The Prison Reform Trust (PRT) is an independent UK charity working to create a just, humane and effective penal system. We do this by inquiring into the workings of the system; informing prisoners, staff and the wider public; and by influencing Parliament, government and officials towards reform. The Prison Reform Trust provides the secretariat to the All Party Parliamentary Penal Affairs Group and has an advice and information service for people in prison.

The Prison Reform Trust's main objectives are:

- reducing unnecessary imprisonment and promoting community solutions to crime
- improving treatment and conditions for prisoners and their families
- promote equality and human rights in the criminal justice system.

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Introduction

The probation service stands at a critical juncture. Years of underinvestment, staffing shortages, and rising caseloads have left it struggling to deliver its core mission: protecting the public and supporting rehabilitation. The government's Sentencing Bill offers a vital opportunity to reduce unnecessary imprisonment and strengthen community-based justice. But without concerted action, these reforms risk overwhelming an already fragile system.

Our submission highlights five key challenges:

1. **The impact of the Sentencing Bill** – expanding alternatives to custody is welcome, but success depends on properly resourced probation and community services.
2. **Prioritisation pressures** – measures like Probation Reset may ease workloads in the short term but risk undermining rehabilitation and public safety.
3. **Dynamic risk** – without sustained support, individuals assessed as low risk can escalate, increasing danger and system strain.
4. **Women** – reforms must include tailored, gender-specific interventions.
5. **Unpaid work delivery** – while valuable, unpaid work cannot be treated as a “silver bullet”; a balanced approach that addresses root causes of offending is essential.

A resilient probation service is not optional—it is the foundation of a safer, fairer justice system.

The impact of the Sentencing Bill on probation

With the prison population close to record levels and capacity running critically low, legislation to bring our use of imprisonment down to a more proportionate and sustainable level is essential.

As the government states in the Sentencing Bill's accompanying factsheet: "Although we are building prisons at an exceptional rate, we cannot simply build our way out of this crisis. Without significant reform, demand for places will outstrip supply by 9,500 in early 2028".¹

England and Wales already has one of the highest imprisonment rates in western Europe, second only to Scotland.² The belief that ever-longer prison sentences are the key to tackling crime has brought us to this point: dangerously overcrowded prisons and a justice system close to breaking down.³ These conditions fail victims, who face unacceptable delays in seeking justice, and they fail those we want to stop from reoffending.

The Sentencing Bill's most welcome provisions are those that expand effective alternatives to custody and reserve prison for the most serious offences. Short prison sentences have a poor track record at reducing reoffending. Limiting their use will not only ease pressure on prisons but also deliver better outcomes for individuals and communities.

However, these reforms will only succeed if probation and community services are equipped to meet the challenge. They must be properly staffed and resourced to help people rebuild their lives, reduce reoffending, and create safer communities. As the Justice and Home Affairs Committee has warned:

*"We believe without major changes, the system risks being overwhelmed and the Probation Service is being set up to fail."*⁴

The government's commitment to increase probation funding by up to £700 million by 2028–29 is welcome recognition of the chronic underinvestment the service has endured for over a decade; and support the delivery of the recommendations of the Independent Sentencing Review. Yet critical questions remain.

How much will be targeted towards staff recruitment, retention and training; how much will be allocated for third sector providers of rehabilitation services; and how

¹ Ministry of Justice. (2025, September 3). *Sentencing Bill: overarching factsheet*. GOV.UK. <https://www.gov.uk/government/publications/sentencing-bill-2025/sentencing-bill-overarching-factsheet>

² Institute for Crime & Justice Policy Research. (n.d.). *Highest to lowest - prison population rate*. World Prison Brief. Retrieved September 8, 2025, from https://www.prisonstudies.org/highest-to-lowest/prison-population-rate?field_region_taxonomy_tid=14

³ Committee of Public Accounts. (2025). *Prison estate capacity* (HC 366). House of Commons. <https://publications.parliament.uk/pa/cm5901/cmselect/cmpublic/366/report.html>

⁴ Justice and Home Affairs Committee. (2025). *Policy letter on Electronic Monitoring*. <https://committees.parliament.uk/committee/519/justice-and-home-affairs-committee/news/210076/probation-service-being-set-up-to-fail-with-tagging-expansion-says-lords-committee/>

much will be spent on new electronic monitoring contracts — given the private sector’s poor track record in delivering these services?⁵

Despite this — and perhaps somewhat optimistically — the government estimates the financial impact on probation to “lead to a modest increase in average annual costs of £4.5m. This is due to a combination of increased community caseloads through the greater use of suspended sentence orders which will be offset by changes to licence supervision and Post Sentence Supervision (PSS) as well as changes to administrative burdens.”⁶

However, as the NAO warns:

“HMPPS does not expect to secure the scale of workload reductions it originally hoped from [Independent Sentencing Review] recommendations and associated policy decisions, or digital and process changes.”⁷

Such a transformation would be a challenge if the service was starting from a solid foundation, but as the Independent Sentencing Review highlighted:

“The Probation Service is operating under significant strain. The Service is managing high caseloads coupled with low staffing levels, particularly at the Probation Officer (PO) grade (officers who supervise offenders on probation from the medium-risk bracket upwards).”⁸

As of June 2025, there was a shortfall of 2,315 Full Time Equivalent (FTE) POs against the target staffing level.⁹

HM Inspectorate of Probation has expressed serious concern about the current level of performance, despite the significant effort and attention to turn this around:

“unfortunately our findings do not demonstrate that the [Probation] Service is adequately prepared to respond effectively to further change and challenge. Major shortfalls were found in service delivery and work to keep people safe remains a significant cause for concern.”¹⁰

“Senior leaders across HMPPS have become increasingly aware...that recruitment of new officers is not in itself enough to improve the quality of probation service

⁵ Justice and Home Affairs Committee. (2025). *Policy letter on Electronic Monitoring*. <https://committees.parliament.uk/committee/519/justice-and-home-affairs-committee/news/210076/probation-service-being-set-up-to-fail-with-tagging-expansion-says-lords-committee/>

⁶ Ministry of Justice. (2025). *Sentencing Bill Impact Assessment*. <https://bills.parliament.uk/bills/4012/publications>

⁷ National Audit Office. (2025). *Building an effective and resilient Probation Service*. <https://www.nao.org.uk/reports/building-an-effective-and-resilient-probation-service/>

⁸ *Independent Sentencing Review: Final report*. (2025). <https://www.gov.uk/government/publications/independent-sentencing-review-final-report>

⁹ HM Prison and Probation Service. (2025). *HM Prison and Probation Service workforce quarterly: June 2025*. <https://www.gov.uk/government/statistics/hm-prison-and-probation-service-workforce-quarterly-june-2025/hm-prison-and-probation-service-workforce-quarterly-june-2025>

¹⁰ HM Inspectorate of Probation. (2025, April 29). *“Major shortfalls” found in national arrangements of the Probation Service*. <https://hmiprobation.justiceinspectrates.gov.uk/news/major-shortfalls-found-in-national-arrangements-of-the-probation-service/>

delivery. Additional processes are not needed to improve the management of people on probation; operational stability for well-trained frontline officers, with access to the right resources, and supportive yet robust leadership is required.”¹¹

De-prioritising low risk, resettlement work and prioritising medium and high risk people on probation

In the face of such challenge, it is entirely understandable that HMPPS has introduced measures, including the introduction of Probation Reset, aimed at reducing pressure on caseloads.

Unfortunately, as the NAO highlights, this has been insufficient to reduce pressure on the service so far:

“HMPPS acknowledges that the Probation Service is currently unsustainable, requiring significant corrective action. It has made pragmatic decisions to deal with staffing shortfalls by reducing rehabilitative activity and supervision, but these have not sufficiently reduced PO workloads. Further, to avoid running out of prison places, MoJ plans to implement legislative changes that will significantly increase demands on the Probation Service.”¹²

There are also concerns about how well HMPPS understands the short-term impact of the changes to date, and whether they will have a long-term effect on rehabilitation on rehabilitation and public protection.

“HMPPS aims to target resources where they can be most effective, but its evidence base is limited in some areas. For example, HMPPS does not yet know the impact of prioritisation schemes such as Reset and Impact on rehabilitation or public safety outcomes. These schemes were specifically designed to prioritise higher-risk offenders, but their long-term impact on rehabilitation and public safety has not yet been evaluated.”¹³

HM Inspectorate of Probation has made clear that further changes are inevitable to ensure sufficient capacity and improve service quality:

“This will mean difficult decisions about what is done, and with whom, to ensure those most at risk of further offending and causing serious harm are managed sufficiently.”¹⁴

While these measures may be necessary and pragmatic in the short term, they carry significant risks and unintended consequences. Reducing rehabilitative activity for lower-risk individuals—many of whom have complex needs—could undermine long-term public safety and perpetuate cycles of reoffending.

¹¹ HM Inspectorate of Probation. (2025, April 29). *National Inspection – April 2025*.

<https://hmiprobation.justiceinspectorates.gov.uk/document/national-inspection-april-2025>

¹² National Audit Office. (2025). *Building an effective and resilient Probation Service*.

<https://www.nao.org.uk/reports/building-an-effective-and-resilient-probation-service/>

¹³ National Audit Office. (2025). *Building an effective and resilient Probation Service*.

<https://www.nao.org.uk/reports/building-an-effective-and-resilient-probation-service/>

¹⁴ HM Inspectorate of Probation. (2025, April 29). *National Inspection – April 2025*.

<https://hmiprobation.justiceinspectorates.gov.uk/document/national-inspection-april-2025>

Low risk individuals often have high levels of need

Research by the Ministry of Justice in 2021 found that those serving short custodial sentences had higher rates of identified needs than people serving longer determinate sentences.¹⁵ These include housing support, mental health and drug treatment support, family interventions, employment and training support and finance and debt/ benefit support.

This reality was acknowledged in the Offender Rehabilitation Act 2014, which introduced mandatory supervision for people leaving prison after short sentences.¹⁶ The rationale was clear: short spells in custody provide little opportunity to address the underlying causes of offending. However, while well-intentioned, this policy failed to deliver the necessary support and instead drove a sharp increase in recalls to custody—a problem that continues today.¹⁷

The government's current approach, which recognises the ineffectiveness of short custodial sentences compared to community and suspended sentence orders, is welcome. Removing post-sentence supervision—shown to deliver “no tangible reduction in reoffending”¹⁸—should allow probation to focus on interventions that work. As HM Inspectorate of Probation has noted, mandatory supervision diverted resources away from supporting community sentences and toward enforcing licence conditions.¹⁹

Yet this reform will only succeed if people receive the support they need to tackle the drivers of offending. Without adequate housing, treatment, and employment support, individuals are far more likely to breach licence conditions or reoffend—triggering a recall to custody or activation of a suspended sentence. This creates a self-defeating cycle: temporary relief for prison capacity followed by renewed pressure, alongside increased administrative burden for probation.

Risk is dynamic and can escalate

Risk is not static. Individuals assessed as low risk can become medium or high risk over time—and vice versa. This reality demands a system that prioritises ongoing support and monitoring, not one that assumes risk remains fixed.

¹⁵ Ministry of Justice. (2022, June 1). *Identified needs of offenders in custody and the community from the Offender Assessment System, 30 June 2021*. GOV.UK. <https://www.gov.uk/government/statistics/identified-needs-of-offenders-in-custody-and-the-community-from-the-offender-assessment-system-30-june-2021/identified-needs-of-offenders-in-custody-and-the-community-from-the-offender-assessment-system-30-june-2021>

¹⁶ HM Inspectorate of Probation. (2019). *Post-release supervision for short-term prisoners: The work undertaken by Community Rehabilitation Companies*. <https://hmiprobation.justiceinspectorates.gov.uk/document/post-release-supervision-for-short-term-prisoners-the-work-undertaken-by-community-rehabilitation-companies/>

¹⁷ Prison Reform Trust. (2025, February 12). *Dramatic rise in prison recalls threatens to undermine emergency prison overcrowding measures*. <https://prisonreformtrust.org.uk/dramatic-rise-in-prison-recalls-threatens-to-undermine-emergency-prison-overcrowding-measures/>

¹⁸ HM Inspectorate of Probation. (2019). *Post-release supervision for short-term prisoners: The work undertaken by Community Rehabilitation Companies*. <https://hmiprobation.justiceinspectorates.gov.uk/document/post-release-supervision-for-short-term-prisoners-the-work-undertaken-by-community-rehabilitation-companies/>

¹⁹ Jones, M. (2024, October 30). *A statement from HM Chief Inspector of Probation, on the launch of an Independent Review of Sentencing*. HM Inspectorate of Probation. <https://hmiprobation.justiceinspectorates.gov.uk/news/a-statement-from-hm-chief-inspector-of-probation-on-the-launch-of-an-independent-review-of-sentencing/>

Protective factors such as substance misuse treatment, stable housing, employment, education, supportive relationships, and cognitive-behavioural interventions are proven to reduce offending. These supports are essential for compliance with licence conditions and successful reintegration into the community.

HM Chief Inspector of Prisons has been clear that prisons are currently failing to provide access to the vital rehabilitative activity necessary to support people away from crime. Such a failure is setting people up to fail when they are eventually released, and as the inspectorate cautions “looming cuts to education delivery in prisons are likely to make matters even worse”.²⁰

The government’s new sentence progression model will see people spending a larger proportion of their custodial sentence in the community under supervision. This, as the NAO cautions, could “*increase[e] the size and risk profile of the probation caseload.*”²¹

Without adequate community support, people with high levels of need risk escalating to higher-risk categories. This is not only a public safety issue—it compounds pressure on an already overstretched probation system.

Indeed, the proportion of the probation caseload assessed as higher-risk has already risen post-unification, placing further pressure on the service:

*“While the probation caseload has remained relatively stable post unification (around 242,000 in 2025), the proportion of higher-risk cases which can only be handled by qualified Probation Officers (POs) has increased from 12% in June 2021 to 22% in December 2024. At the same time, staffing shortages in the Probation Service have persisted in the PO grade.”*²²

Concerns first raised during the Transforming Rehabilitation reforms regarding the effective management of risk escalation remain unresolved. HM Inspectorate of Probation reports:

*“Learning from serious further offence reviews has included the need for robust transfer activity. However, in the cases we inspected, there were deficits in transfer practice. These included poor communication between areas, delays in completing actions and ineffective escalation processes. Worryingly, these concerns were a feature in several cases subject to reset.”*²³

Furthermore, the significant pressure on resources risks seeing more people facing a cliff-edge of support once they complete their “intensive supervision” period of their sentence. Even before the introduction of the new progression model, inspectors have raised concerns about the current impact of Probation Reset:

²⁰ HM Inspectorate of Prisons. (2025, October 13). ‘Just passing time’: A review of work and training provision in adult prisons. https://hmiprisons.justiceinspectorates.gov.uk/hmipris_reports/just-passing-time-a-review-of-work-and-training-provision-in-adult-prisons/

²¹ National Audit Office. (2025). *Building an effective and resilient Probation Service.* <https://www.nao.org.uk/reports/building-an-effective-and-resilient-probation-service/>

²² National Audit Office. (2025). *Building an effective and resilient Probation Service.* <https://www.nao.org.uk/reports/building-an-effective-and-resilient-probation-service/>

²³ HM Inspectorate of Probation. (2025, April 29). *National Inspection – April 2025.* <https://hmiprobation.justiceinspectorates.gov.uk/document/national-inspection-april-2025>

“Inspectors noted deficits in the way that people on probation were prepared to enter reset. For example, they were given limited information beyond a basic letter, which often provided insufficient signposting to onward support. Complex risks and needs were not adequately planned for in several cases, including in some cases assessed as high risk with indicators of domestic abuse present. In cases that were inspected against adjusted standards, there was often insufficient time for practitioners to deliver meaningful interventions to address relevant risks, and agencies were not sufficiently coordinated to support delivery.”²⁴

Women

A series of inquiries and reports in recent decades have all concluded that prison is rarely a necessary, appropriate or proportionate response to women who offend, including the influential Corston Report on women with particular vulnerabilities in the criminal justice system — published over fifteen years ago.

75% of immediate prison sentences given to women in 2024 were for less than 12 months.²⁵ Most women entering prison to serve a sentence (60%) have committed a non-violent offence, and in 2023, more women were sent to prison to serve a sentence for theft than for criminal damage and arson, drug offences, possession of weapons, robbery, and sexual offences combined.²⁶

We strongly support the government’s presumption to suspend short custodial sentences. This reform will rightly result in more women receiving suspended or community sentences rather than immediate custody.

However, this shift brings a critical challenge: women in the justice system often experience multiple, complex, and unmet needs.²⁷ Many are victims of more serious crimes than those for which they are convicted.²⁸ Our earlier point—that low-risk individuals often have high levels of need—is especially true for women.

Without tailored, gender-specific interventions in the community, these needs will go unmet. The consequence? Increased risk of breach, recall, and reoffending—undermining the very purpose of reform.

²⁴ HM Inspectorate of Probation. (2025, April 29). *National Inspection – April 2025*.

<https://hmiprobation.justiceinspectors.gov.uk/document/national-inspection-april-2025>

²⁵ Ministry of Justice. (2025). Outcomes by Offence data tool: December 2024. *Criminal Justice System statistics quarterly: December 2024*.

<https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2024>

²⁶ Ministry of Justice (2024). Table 2.A.12, Receptions 2023. *Offender management statistics quarterly: October to December 2023*. <https://www.gov.uk/government/statistics/offender-management-statistics-quarterly-october-to-december-2023>

²⁷ House of Commons Justice Committee. (2022). *Women in Prison* (HC 265).

<https://publications.parliament.uk/pa/cm5803/cmselect/cmjust/265/report.html>

²⁸ Prison Reform Trust. (2017). *“There’s a reason we’re in trouble”- Domestic abuse as a driver to women’s offending*. <https://prisonreformtrust.org.uk/publication/theres-a-reason-were-in-trouble/>

Impact on unpaid work supervisors

Unpaid work is a key sentencing option, designed to deliver punishment and reparation through projects that benefit local communities. However, recent inspections reveal significant challenges in its delivery.

HM Inspectorate of Probation's thematic review highlighted serious issues:²⁹

- Backlogs and delays in starting placements
- High numbers of community sentences terminated without completing unpaid work
- Placements that failed to build employment-related skills
- Inadequate risk information for supervisors

Although performance has “improved significantly,” the chief inspector warns:

“building a renewed confidence in unpaid work will be crucial in delivering effective punishment and making a positive impact on people’s lives.”³⁰

Despite recruitment efforts following probation reunification, staffing remains inconsistent, with high attrition rates affecting delivery in some areas.³¹ The role itself is demanding:

“The supervisor’s role can be challenging and involves the lone supervision of UPW groups. Many supervisors demonstrated excellent practice during the inspection and had established good professional relationships, supported by pro-social behaviour.”

Yet a majority of staff surveyed by inspectors expressed dissatisfaction with the level of training provided.

The Sentencing Bill is expected to increase caseloads as demand shifts from custody to community. While unpaid work and curfews are legitimate forms of punishment, they are not the only tools available. Community Sentence Treatment Requirements—addressing alcohol, drug, or mental health issues—are vital for tackling the root causes of offending. The Independent Sentencing Review cautions:

“The heightened burden of unpaid work on top of a strict alcohol, drug or mental health treatment requirement may mean the offender is less able to complete the treatment needed to get them to turn their back on crime.”

We share practitioners' concerns that unpaid work risks being treated as a “silver bullet” for people diverted from custody. Without a balanced approach that prioritises rehabilitation alongside punishment, these reforms will fail to deliver lasting change.

²⁹ Cooney, F. (2025). *Sentencing Bill 2024-25: Research Briefing*. House of Commons Library. <https://commonslibrary.parliament.uk/research-briefings/cbp-10332/>

³⁰ HM Inspectorate of Probation. (2025). *A thematic inspection of the delivery of unpaid work*. <https://hmiprobation.justiceinspectors.gov.uk/document/a-thematic-inspection-of-the-delivery-of-unpaid-work/>

³¹ HM Inspectorate of Probation. (2025). *A thematic inspection of the delivery of unpaid work*. <https://hmiprobation.justiceinspectors.gov.uk/document/a-thematic-inspection-of-the-delivery-of-unpaid-work/>